1	RANDALL S. LUSKEY (SBN: 240915)			
2	rluskey@paulweiss.com PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP			
3	535 Mission Street, 24th Floor			
4	San Francisco, CA 94105 Telephone: (628) 432-5100			
5	Facsimile: (628) 232-3101			
6	ROBERT ATKINS (Pro Hac Vice admitted)			
	CAITLIN E. GRUSAUSKAS (<i>Pro Hac Vice</i> admitted)			
7	cgrusauskas@paulweiss.com ANDREA M. KELLER (<i>Pro Hac Vice</i> admitted)			
8				
9	& GARRISON LLP 1285 Avenue of the Americas			
10	New York, NY 10019			
11	Telephone: (212) 373-3000 Facsimile: (212) 757-3990			
12	Attorneys for Defendants UBER TECHNOLOGIES, INC., RASIER, LLC, and RASIER-CA, LLC			
13				
14	[Additional Counsel Listed on Following Page]			
15				
16	UNITED STATES DISTRICT COURT			
17	NORTHERN DISTRICT OF CALIFORNIA			
18	SAN FRANCISCO DIVISION			
19				
20	IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT	Case No. 3:23-md-03084-CRB		
21	LITIGATION	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR PROPOSALS		
22	This Document Relates to:	REGARDING SHORT FORM COMPLAINTS		
23	ALL ACTIONS	Judge: Hon. Charles R. Breyer		
24		Courtroom: 6 – 17th Floor		
25				
26				
27				
28				

1 2	KYLE N. SMITH (<i>Pro Hac Vice</i> admitted) ksmith@paulweiss.com JESSICA E. PHILLIPS (<i>Pro Hac Vice</i> admitted)	SARAH R. LONDON (SBN 267083) LIEFF CABRASER HEIMANN &
3	jphillips@paulweiss.com PAUL, WEISS, RIFKIND, WHARTON	BERNSTEIN 275 Battery Street, Fl. 29
4	& GARRISON LLP 2001 K Street, NW	San Francisco, CA 94111 Telephone: (415) 956-1000
5	Washington DC, 20006 Telephone: (202) 223-7300	Email: slondon@lchb.com
6	Facsimile: (202) 223-7420	DACHEL DADDANG (GDN 200215)
7	Attorney for Defendants UBER TECHNOLOGIES, INC.,	RACHEL B. ABRAMS (SBN 209315) PEIFFER WOLF CARR KANE CONWAY & WISE, LLP
8	RASIER, LLC, and RASIER-CA, LLC	555 Montgomery Street, Suite 820
9		San Francisco, CA 94111 Telephone: (415) 426-5641
10		Email: rabrams@peifferwolf.com
11		ROOPAL P. LUHANA (Pro Hac Vice)
12		CHAFFIN LUHANA LLP 600 Third Avenue, Fl. 12
13		New York, NY 10016
14		Telephone: (888) 480-1123 Email: luhana@chaffinluhana.com
15		Co-Lead Counsel for Plaintiffs
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

STIPULATION 1 2 WHEREAS, on December 28, 2023, the Court established a schedule regarding discovery 3 and initial motions. Pretrial Order No. 5, Dkt. No. 175; WHEREAS, the Court ordered the parties to file joint or competing proposals regarding 4 5 the form and procedure for Short Form Complaints, including deadlines, by February 29, 2024. 6 *Id.* at 5; 7 WHEREAS, the parties have met and conferred regarding the form and procedure for Short 8 Form Complaints, including deadlines; 9 WHEREAS, on February 26, 2024, Plaintiffs provided Uber with a draft Short Form 10 Complaint and Implementation Order. WHEREAS, Uber has agreed to respond to Plaintiffs' current proposal by March 1, 2024; 11 12 WHEREAS, the parties agree that extending the deadline to submit a joint or competing 13 proposals will facilitate the efficient resolution of any areas of disagreement among the parties; 14 WHEREAS, Plaintiffs agreed to an extension of the deadline until March 5, 2024 on the 15 condition that Uber respond to Plaintiffs' current proposal by March 1, 2024; 16 **THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that: 17 The parties shall file joint or competing proposals regarding the form and procedure for 18 Short Form Complaints, including deadlines, by March 5, 2024. 19 IT IS SO STIPULATED. 20 2.1 /// 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

1		
2	Dated: February 29, 2024	PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
3		Pyr /s/ Pandall S. Luskay
4		By: <u>/s/ Randall S. Luskey</u> ROBERT ATKINS
5		RANDALL S. LUSKEY KYLE N. SMITH
6		JESSICA E. PHILLIPS CAITLIN E. GRUSAUSKAS
7		ANDREA M. KELLER
		Attorneys for Defendants
8		UBER TECHNOLOGIES, INC., RASIER, LLC, and RASIER-CA, LLC
9		
10	Dated: February 29, 2024	By: <u>/s/ Sarah R. London</u>
11		Sarah R. London (SBN 267083) LIEFF CABRASER HEIMANN
12		& BERNSTEIN
13		275 Battery Street, Fl. 29 San Francisco, CA 94111
		Telephone: (415) 956-1000
14		slondon@lchb.com
15		By: /s/ Rachel B. Abrams
16		Rachel B. Abrams (SBN 209315)
17		PEIFFER WOLF CARR KANE CONWAY & WISE, LLP
18		555 Montgomery Street, Suite 820
		San Francisco, CA 94111 Telephone: (415) 426-5641
19		rabrams@peifferwolf.com
20		
21		By: <u>/s/ Roopal P. Luhana</u>
22		Roopal P. Luhana CHAFFIN LUHANA LLP
23		600 Third Avenue, Floor 12
		New York, NY 10016 Telephone: (888) 480-1123
24		luhana@chaffinluhana.com
25		Co-Load Counsel for Plaintiffs
26		Co-Lead Counsel for Plaintiffs
27		
28		
	I	4

FILER'S ATTESTATION I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing. Dated: February 29, 2024 /s/ Randall S. Luskey By: Randall S. Luskey

1	Case 3:23-md-03084-CRB Documer	nt 315 Filed 03/01/24 Page 6 of 6		
1				
2				
3				
4				
5				
6				
7	UNITED STATES DISTRICT COURT			
8	NORTHERN DISTRICT OF CALIFORNIA			
9	SAN FRANCISCO DIVISION			
10				
11	IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT	Case No. 3:23-md-03084-CRB		
12	LITIGATION	[PROPOSED] ORDER GRANTING STIPULATION EXTENDING TIME		
13	This Document Relates to:	FOR PROPOSALS REGARDING SHORT FORM COMPLAINTS		
14	ALL ACTIONS			
15				
16				
17	The Court hereby GRANTS the parties' stipulation as follows:			
18	The parties shall file joint or competing proposals regarding the form and procedure fo			
19	Short Form Complaints, including deadlines, by March 5, 2024.			
20				
21	PURSUANT TO STIPULATION, IT IS SO ORDERED.			
22		- R		
23	Date: March 1 , 2024 HO	N. CHARLES R. BREYER		
24	UN	ITED STATES DISTRICT JUDGE		
25				
26				
27				
28		- 6 -		